

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
ANDREW HINES SAM FORD ZACHARY BROCKINGTON	:	VIOLATIONS: 18 U.S.C. § 371 (Conspiracy-1 Count) 18 U.S.C. § 2113(a) (Bank robbery - 6 Counts)

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, the deposits of First Trust Bank, Citizens Bank, PNC Bank, Wachovia Bank, Fleet Bank, and Republic First Bank were insured by the Federal Deposit Insurance Corporation.
2. From in or about at least August 2, 2003 through on or about October 28, 2003, in the Eastern District of Pennsylvania, defendants

ANDREW HINES,
SAM FORD, and
ZACHARY BROCKINGTON

conspired and agreed together and with Anthony Adams and Shakira Williams, charged elsewhere, to commit bank robbery, in violation of 18 U.S.C. § 2113(a).

MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that:

1. Defendant ANDREW HINES, Anthony Adams, and Shakira Williams looked for banks that did not have security measures such as guards stationed in the bank or

bulletproof glass in front of the tellers.

2. Defendants ANDREW HINES, SAM FORD, and ZACHARY BROCKINGTON, Anthony Adams and Shakira Williams, entered the banks wearing disguises, presented the tellers with notes warning them to do as they were told, and demanded United States currency.

OVERT ACTS

In furtherance of the conspiracy, the following overt acts were committed within the Eastern District of Pennsylvania:

First Trust Bank, Jenkintown

1. On or about August 2, 2003, defendant ANDREW HINES, Anthony Adams, and Shakira Williams, all in disguise, entered the First Trust Bank, 261 Old York Road, Jenkintown.

2. Defendant ANDREW HINES and Shakira Williams presented notes to two tellers, demanded money, and got \$10,425 in United States currency.

Citizens Bank, Chestnut Hill

3. On or about September 3, 2003, defendant ANDREW HINES and Anthony Adams, both in disguise, entered the Citizens Bank at 8616 Germantown Avenue, Chestnut Hill.

4. Defendant ANDREW HINES presented a demand note to the teller, who responded that she did not have any large bills.

5. Defendant ANDREW HINES and Anthony Adams left the bank and entered a car driven by Shakira Williams.

PNC Bank, Flourtown

6. On or about September 4, 2003, defendant ANDREW HINES and Anthony Adams, both in disguise, entered the PNC Bank at 1316 Bethlehem Pike, Flourtown.

7. Defendant ANDREW HINES and Anthony Adams waited in line for a short while and left before reaching the counter where the tellers worked.

8. After leaving the bank, defendant ANDREW HINES and Anthony Adams entered a car registered to defendant ANDREW HINES, which was driven by Shakira Williams.

Wachovia Bank, Conshohocken

9. On or about September 8, 2003, Shakira Williams and Anthony Adams, both in disguise, entered the Wachovia Bank at 1920 Butler Pike, Conshohocken.

10. Shakira Williams and Anthony Adams approached separate tellers with notes, demanded money and got \$11,715 in United States currency.

11. Shakira Williams and Anthony Adams left the bank and entered a vehicle in which defendant ANDREW HINES was waiting.

Fleet Bank, Philadelphia

12. On or about September 24, 2003, defendant ANDREW HINES, in disguise, entered the Fleet Bank inside the Pathmark grocery store at 4160 Monument Road, Philadelphia.

13. Defendant ANDREW HINES presented the teller with a demand note and got \$16,915 in United States currency.

14. Defendant ANDREW HINES left the bank and entered a vehicle in which Anthony Adams and Shakira Williams were waiting.

Citizens Bank, Philadelphia

15. On or about September 30, 2003, defendants ANDREW HINES and SAM FORD, both in disguise, entered the Citizens Bank in the Super Fresh supermarket at 2100 Cottman Avenue, Philadelphia. Defendant ANDREW HINES presented the teller with a demand note and got \$1,023 in United States currency.

16. Anthony Adams and Shakira Williams waited in a car outside of the bank.

Republic First Bank, Philadelphia

17. On or about October 24, 2003, defendant ZACHARY BROCKINGTON and Shakira Williams, both in disguise, entered the Republic First Bank, City Line Avenue, Philadelphia. Defendant ZACHARY BROCKINGTON presented a teller with a demand note. Because they thought that the teller had triggered the alarm, defendant ZACHARY BROCKINGTON and Shakira Williams left the bank.

18. Defendant ANDREW HINES and Anthony Adams waited outside of the bank in his car.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 2, 2003, at Jenkintown, in the Eastern District of Pennsylvania, defendant

ANDREW HINES,

Anthony Adams, and Shakira Williams knowingly and unlawfully took, and aided and abetted the taking, by force and violence, and by intimidation, from employees of First Trust Bank, 261 Old York Road, Jenkintown, property and money, that is, approximately \$10,425 in United States currency, belonging to and in the care, custody, control, management and possession of First Trust Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 3, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

ANDREW HINES,

Anthony Adams, and Shakira Williams knowingly and unlawfully attempted to take, and aided and abetted the attempted taking, by force and violence, and by intimidation, from employees of Citizens Bank, 8616 Germantown Avenue, Philadelphia, property and money, belonging to and in the care, custody, control, management and possession of Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 8, 2003, at Conshohocken, in the Eastern District of Pennsylvania, defendant

ANDREW HINES,

Anthony Adams, and Shakira Williams knowingly and unlawfully took, and aided and abetted the taking, by force and violence, and by intimidation, from employees of Wachovia Bank, 1920 Butler Pike, Conshohocken, property and money, that is, approximately \$11,715 in United States currency, belonging to and in the care, custody, control, management and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 24, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

ANDREW HINES,

Anthony Adams, and Shakira Williams knowingly and unlawfully took, and aided and abetted the taking, by force and violence, and by intimidation, from employees of Fleet Bank, 4160 Monument Avenue, Philadelphia, property and money, that is, approximately \$16,915 in United States currency, belonging to and in the care, custody, control, management and possession of Fleet Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 30, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendants

ANDREW HINES,
SAM FORD,

Anthony Adams, and Shakira Williams knowingly and unlawfully took, and aided and abetted the taking, by force and violence, and by intimidation, from employees of Citizens Bank, 2101 Cottman Avenue, Philadelphia, property and money, that is, approximately \$1,023 in United States currency, belonging to and in the care, custody, control, management and possession of Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 24, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendants

ANDREW HINES,
ZACHARY BROCKINGTON,

Anthony Adams, and Shakira Williams knowingly and unlawfully attempted to take, and aided
and abetted the attempted taking, by force and violence, and by intimidation, from employees of
Republic First Bank, City Line Avenue, Philadelphia, property and money, belonging to and in
the care, custody, control, management and possession of Republic First Bank, the deposits of
which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney